Department of Energy

ROCKY FLATS FIELD OFFICE
P O BOX 928
GOLDEN, COLORADO 80402-0928

MAY 17 2000

00-DOE-02450

Mr. Steve Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

Dear Mr. Gunderson

Enclosed please find minor modification #4 to the final Building 776/777 Decommissioning Operations Plan This minor modification is being submitted in accordance with Paragraph 127 of the Rocky Flats Cleanup Agreement (RFCA) and it has been discussed with your staff. It clarifies the requirements for the management of remediation waste. Also enclosed for your information is a copy of the Building 776/777 Operations Order OO-776-374, which is referenced in the minor modification

Per Paragraph 127 of RFCA, a timeframe of 7 days is set for review and approval of minor modifications Therefore, I ask that your agency review the enclosed information and provide your final approval of the modification within 7 days of receipt of this letter

Thank you for your consideration in this matter. Please call me at (303) 966-5918 or Sandi MacLeod at (303) 966-3367 if you have any questions or need more information.

Sincerely,

Joseph A Legare
Assistant Manager
for Environment and Infrastructure

Enclosures

ADMIN RECORD

B776-A-000036
000036

1/23

cc w/Enc
E Kray, CDPHE
C Gilbreath, CDPHE
T Rehder, EPA
M Aguilar, EPA
S MacLeod, FCG, RFFO
G Schuetz, FCG, RFFO
R DiSalvo, FCG, RFFO

cc w/o Enc:
D Grosek, EI, RFFO
D Shelton, K-H
M Ferri, K-H

Buildings with significant contamination or hazards (i e , Type 3 buildings) and buildings without significant contamination or hazards, but in need of decontamination (i e , Type 2 buildings), will be decommissioned in accordance with this Decommissioning Operations Plan (DOP) Buildings within the Cluster that are free of contamination (i e , Type 1 buildings) will be decommissioned using Site procedures upon notification of the Lead Regulatory Agency (LRA), (i e , the Colorado Department of Public Health and Environment [CDPHE]) As detailed in the RLCR, Building 776/777 is believed to be a Type 3 building, Building 730 is believed to be a Type 2 building, and the remaining buildings in the Cluster are believed to be Type 1 buildings Therefore, the scope of this DOP is limited to Buildings 776/777 and 730 It is recognized that additional sampling and analysis will be required to verify the characterization of the Type 1 buildings In the event sampling results indicate the presence of contamination and/or hazards in one or more of the Type 1 buildings, the building(s) will be re-typed and added to a subsequent decision document(s), which may include a modification to this DOP

The RFCA definition of decommissioning includes the demolition of building structures and disposition of building slabs At this time, demolition methods and techniques are still being identified for the Building 776/777 Cluster, along with associated controls and performance specifications necessary to protect worker safety, public health, and the environment. As a result, the demolition stage of decommissioning is not included in Revision 0 of the DOP. This information will be provided in a subsequent decision document(s), which will constitute a major modification to this DOP. In addition to the routine requirements for major modifications, this information on Building 776/777 demolition will be submitted for a public comment period equivalent to that for the initial Building 776/777 DOP.

Work performed under this DOP will be accomplished in conformance with the RFETS Integrated Work Control Program (IWCP), Integrated Safety Management System (ISMS), and applicable quality assurance (QA), radiological control, and waste management requirements ~~At this time, a site-wide strategy for managing remediation waste has not been finalized. As a result, during the early stages of decommissioning, hazardous and mixed wastes will be managed in compliance with the substantive and administrative requirements of the Resource Conservation and Recovery Act (RCRA), (Ref. i), the Colorado Hazardous Waste Act (CHWA), (Ref. ii), the Colorado Hazardous Waste Regulations (CHWR), (Ref iii), and the RFETS RCRA Part B Permit (Ref. iv) Once the remediation waste management strategy has been finalized, this information will be provided in a minor modification to this DOP, consistent with the waste management requirements of the DPP~~

Mod #4

Decommissioning activities will be documented in the Building 776/777 Closure Project Record, RCRA Operating Record, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, Ref v) Administrative Record. Upon completion of decommissioning activities and final characterization, a Final Closeout Report will be prepared for review and approval by the LRA

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6.0 WASTE MANAGEMENT

The following paragraphs present an overview of the waste management strategy for the Building 776/777 Cluster

6.1 RCRA/CERCLA Transition

~~At this time, a site-wide strategy for managing remediation waste has not been finalized. As a result, during the early stages of decommissioning, hazardous and mixed wastes will be managed in compliance with the substantive and administrative requirements of RCRA/CHWA, the CHWR, and the RFETS RCRA Part B Permit. Once the remediation waste management strategy has been finalized, this information will be provided to the LRA in a minor modification to this DOP, consistent with the waste management requirements of the DPP.~~

Wastes generated during decommissioning will be accumulated, staged, stored, and treated in accordance with this section of the DOP. During decommissioning the distinction between "process waste" and "remediation waste" will be maintained to ensure proper management. Process waste includes all liquid waste chemicals and wastes generated as a result of normal building operations or deactivation activities (e g., containerized waste generated prior to approval of this DOP [November 5, 1999]; mixed residues, and liquids, sludges, and oils in tanks and ancillary equipment). Remediation waste is all waste, media, and debris generated from decommissioning activities performed under this DOP, all solid waste chemicals (no matter when generated), and residual liquids or sludges remaining in RCRA Stable or Physically Empty tanks

Mod #4

Hazardous and mixed wastes designated as process waste will continue to be managed in compliance with both the substantive and administrative requirements of RCRA, CHWA, CHWR, and the Site's RCRA Part B Permit. Hazardous and mixed wastes designated as remediation waste will be managed in accordance with the Applicable or Relevant and Appropriate Requirements (ARARs) presented in Section 7 of this DOP and with the remediation waste management requirements described in Building 776/777 Operations Order OO-776-374 The ARARs and Operations Order provide project managers and waste management personnel with a level of flexibility appropriate in managing hazardous and mixed wastes during decommissioning

6.2 Waste Types and Volumes

As discussed in Section 2, beginning in 1958 and continuing through 1969, Building 776/777 housed the Site's Pu foundry, fabrication operations, and parts assembly operations. Subsequent to the fire in 1969, the primary function of the building turned to waste and residue handling, disassembly of retired weapons components, special projects, and support operations, such as laboratories As a result, a variety of regulated wastes are currently managed and stored in Building 776/777, and additional waste will be generated during decommissioning. Table 12 presents a list of the process waste stored in the building on June 1, 1999 Table 13 provides an estimate of the remediation waste types and volumes that will be generated during decommissioning

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6.5 Waste Accumulation, Staging, Storage, and Treatment

Wastes generated during decommissioning will be characterized and packaged in compliance with RFETS waste management procedures, which implement disposal site WAC and DOT packaging requirements. Process and remediation waste that meets the definition of RCRA hazardous or mixed waste may be accumulated, stored, staged, and/or treated in or around the Building 776/777 Cluster in permitted storage and treatment units. Remediation waste may be treated or stored in temporary units approved by CDPHE. Unit specific information will be submitted as a minor modification to this DOP as these temporary units become necessary. Such modifications will include the following information:

- Type of unit,
- Length of time the unit will be in operation,
- Volumes of remediation waste to be managed,
- Physical and chemical characteristics of the remediation waste to be managed,
- Potential for releases from the unit,
- Hydrogeological and other relevant environmental conditions at the facility that may influence the migration of potential releases, and
- Potential for exposure of humans and environmental receptors if releases were to occur.

Mod #4

Table 16 provides a summary of the routine treatment processes that may be conducted in temporary units during decommissioning activities in the Building 776/777 Cluster.

Table 16. Treatment Processes that May be Conducted in Temporary Units

Table 16 - Deleted

5

7.0 APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

To the maximum extent possible, decommissioning activities must comply with the Applicable or Relevant and Appropriate Requirements (ARARs) under the Comprehensive Response Compensation and Liability Act (CERCLA) (Ref vi) ARARs have been identified for the complete scope of decommissioning activities, including demolition The ARARs are listed in Appendix F

Pursuant to ¶16 and ¶17 of RFCA, the procedural requirements to obtain federal, state, or local permits are waived as long as the substantive requirements that would have been imposed by the permit process are identified. Furthermore, the method used to comply with the substantive requirements must be explained The permits that will be waived for decommissioning activities in the Building 776/777 Cluster are the RCRA Part B permits for storage, treatment, and temporary units. The methods used to meet the substantive requirements imposed by the permit process are described in Sections 4 5, 6 1 through 6 6, and 7 4 through 7.5

The following paragraphs describe how the ARARs will be applied to decommissioning activities in the B776/777 Cluster. They are intended to complement other descriptions in the DOP in a manner that satisfies the RFCA permit waiver requirements

7.1 Air

Closure activities have the potential to generate particulate, radionuclide, fugitive dust, and hazardous air pollutant emissions. Subpart H of 40 CFR 61 contains the requirements for monitoring and reporting activities within DOE facilities that have the potential to emit radionuclides other than radon. Building 776/777 is subject to effluent monitoring of radionuclides due to holdup in ducts and GBs 5 CCR 1001-3, Regulation No 1, (Ref vii) governs opacity and particulate emissions. Regulation No. 1, Section II, addresses opacity and prohibits stack emissions from fuel-fired equipment exceeding 20% opacity Regulation No. 1, Section III, addresses the control of particulate emissions Fugitive particulate emissions will be generated from demolition and transportation activities. Control methods for fugitive particulate emissions should be practical, economically reasonable and technologically feasible. During demolition activities, dust minimization techniques, such as water sprays, may be used to minimize suspension of particulates In addition, demolition operations will not be conducted during periods of high wind. The substantive requirements will be incorporated into a control plan that defines the level of air monitoring and particulate control for the project

5 CCR 1001-3, Regulation No 3, (Ref viii), provides CDPHE with the authority to authority inventory emissions. Regulation No 3, Part A, describes Air Pollutant Emission Notice (APEN) requirements. If applicable, RFETS will prepare an APEN to facilitate the CDPHE inventory process

7.2 Solid Waste

~~At this time, a site-wide strategy for managing remediation waste has not been finalized. As a result, during the early stages of decommissioning, hazardous and mixed wastes will be managed in compliance with the substantive and administrative requirements of RCRA/CHWA, the CHWR, and the RFETS RCRA Part B Permit. Once the remediation waste management strategy has been finalized, this information will be provided to the LRA in a minor modification to this DOP, consistent with the waste management requirements of the DPP.~~ Mod #4

Non-radioactive, non-hazardous wastes will be managed in compliance with the substantive requirements of CDPHE regulations pertaining to solid waste management and disposal (6 CCR 1007-2), (Ref ix). Hazardous and mixed wastes designated as "process waste" will be managed in accordance with the substantive and administrative requirements of RCRA, CHWA, CHWR, and the Site's RCRA Part B Permit Hazardous and mixed wastes designated as "remediation waste" will be managed in accordance

with the substantive requirements of RCRA, CHWA, and the CHWR, which are listed in Appendix F of this DOP and included in Building 776/777 Operations Order OO-776-374, Management Requirements for Remediation Waste ~~If necessary, remediation waste may be treated under the TU substantive requirements established in 6 CCR 1007-3, Part 264 553 Incompatible waste, if encountered, will be segregated within the units An assessment will be performed to determine the need for secondary containment Secondary containment will be provided, as appropriate, when liquid waste is stored or treated in tanks or containers Wastes will be characterized, as appropriate, in accordance with the substantive requirements of 6 CCR 1007-3, Part 261, and 40 CFR 761 When tanks are physically empty, berms providing secondary containment will be removed to facilitate equipment removal~~

~~7.3 Treatment~~

~~During decommissioning, treatment may be conducted under two separate scenarios~~

~~1) Routine Treatment~~

- ~~Generator treatment conducted in accordance with 6 CCR 1007-3, Part 268, will be the most common type of treatment during decommissioning.~~
- ~~Treatment in accordance with the RCRA Part B Permit may be conducted for those wastes that cannot be treated under the generator requirements~~

Mod #4

~~2) Debris Treatment~~

- ~~Debris treatment may be conducted where similar types of debris are generated.~~

~~7 3 1 Routine Treatment~~

~~Routine treatment includes generator treatment and treatment in accordance with the substantive requirements of 6 CCR 1007 3 and the RCRA Part B Permit. Section 6 5 describes how the substantive requirements for generator treatment and treatment under the Part B permit will be applied to routine waste treatment~~

~~7 3 2 Debris Treatment~~

~~Debris treatment will be conducted in accordance with steps outlined in Sections 4 5 1 2 and 6 5 of this DOP Waste resulting from the treatment of debris will be managed in accordance with the waste management ARARs Waste resulting from the treatment of listed debris will carry the same listing as the listed debris from which it originated. Liquid waste that meets the applicable acceptance criteria will be treated in Building 374 or the Site sewage treatment plant~~

7 3 Deleted

7.4 Wastewater

Wastewater generated from decommissioning activities will be collected and characterized to determine the appropriate disposal path Domestic water; non-hazardous, non-radioactive, non-domestic water (i e , cooling tower water and boiler blowdown), and non-hazardous, non-radioactive internal waste streams generated during decommissioning will be transferred to the Site sewage treatment plant for processing Hazardous and/or radioactive wastewater that meets the acceptance criteria of the Building 374 treatment facilities will be collected and transferred to Building 374 for treatment. Hazardous and/or radioactive wastewater that does not meet the acceptance criteria of the Site sewage treatment plant or Building 374 treatment facilities will be managed in temporary units authorized by CDPHE (see Section 6 5)

7

7.5 Asbestos Containing Material

ACM will be managed in accordance with 5 CCR 1001-10, Regulation 8 Specifically, Section III, C 7 6, provides maximum allowable asbestos levels and sections C 8 2(b), (d) and (f) provide requirements for handling asbestos waste materials

7.6 Polychlorinated Biphenyls

PCBs will be managed in accordance with the substantive requirements of 40 CFR Part 761, Disposal of Polychlorinated Biphenyls Radiologically contaminated PCBs will be managed in conformance with applicable Federal Facilities Compliance Agreement (FFCA) requirements until a final storage facility is approved.

7.7 Migratory Birds

Closure activities may impact migratory birds protected by the Migratory Bird Treaty Act (Ref. X), and the Fish and Wildlife Conservation Act (Ref X1). Due to the variations in potential impacts depending upon the season and the nesting schedules for migratory birds, the substantive requirements of these federal statutes, as they apply to federal facilities, will be evaluated prior to conducting the actions associated with decommissioning. The substantive requirements identified during the evaluation will be implemented in accordance with the statutes and associated regulations

8

i	Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments Act (HSWA) and the Federal Facility Compliance Act (FFCAct), 42 USC 6901 *et seq*
ii	Colorado Hazardous Waste Act, CRS 25-15-101
iii	Colorado Hazardous Waste Regulations, 6 CCR 1007-3
iv	Rocky Flats Environmental Technology Site RCRA Part B Permit, CO-097-05-30-01, effective 06/30/97
v	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC 9620
vi	Comprehensive Response, Compensation, and Liability Act, as amended by the Superfund Amendments and Reauthorization Act (SARA) and the Community Environmental Response Facilitation Act (CERFA), 42 USC 9601.
vii	5 CCR 1001-3, Regulation No. 1, Emission Controls for Particulates, Smoke, Carbon Monoxide, and Sulfur Oxides
viii	5 CCR 1001-3, Regulation No 3, Air Pollutant Emission Notice (APEN)
ix	6 CCR 1007-2, CDPHE Regulations Pertaining to the Disposal of Solid Waste
x	Migratory Bird Treaty Act, 16 USC 701 *et seq*
xi	Fish and Wildlife Conservation Act, 16 USC 661 *et seq*

9

FACILITY 776/777
OPERATIONS ORDER

Number	OO-776-374
Revision	1
Effective Date	05/xx/00
Expiration Date	05/xx/03
Page	1 of 14

Category ☐ Administrative ■ Technical ☐ Interim

Approved By R G Wall Date 5-5-00
Material Stewardship Manager

Approved By Jed A Hopkins Date 5/5/00
Environmental Manager

☐ Convert to Procedure by N/A
Date Assigned Manager

NOTE *If this box is marked, the Assigned Manager has the responsibility to see that a procedure is drafted, approved, and issued before expiration of the Operations Order*

■ Required Reading Files Senior Management, Process Operations, Shift Managers, Environmental Compliance

MANAGEMENT REQUIREMENTS FOR REMEDIATION WASTE

1. PURPOSE

This Operations Order defines the management requirements for remediation waste Remediation waste is

- All solid, hazardous, and mixed waste,
- All media and debris that contain hazardous substances, listed hazardous or mixed wastes, or exhibit a hazardous characteristic, and
- All hazardous substances

generated from activities regulated by the Rocky Flats Cleanup Agreement (RFCA) as Resources Conservation and Recovery Act (RCRA) corrective actions or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response actions

REVIEWED FOR CLASSIFICATION/UCNI

BY Pam R Paulson

DATE 5-5-00

2.0 SCOPE AND APPLICABILITY

This operations order applies to all Building 776/777 personnel involved in the generation and management of remediation waste

RFCA-regulated activities include

- Decommissioning activities,
- RCRA closures pursuant to the B776/777 Decommissioning Operations Plan (DOP),
- Resource Conservation & Recovery Act (RCRA) corrective actions, and
- CERCLA removal actions

Remediation waste includes

- Waste generated from decommissioning activities performed under an approved RFCA decision document (e g , a DOP or RFCA Standard Operating Protocol [RSOP]),
- Solid waste chemicals (no matter when generated), and
- Residual liquids or sludges remaining in "RCRA Stable" or "Physically Empty" tanks and ancillary equipment

Remediation waste does not include

- Liquid waste chemicals (no matter when generated),
- Liquids, sludges, and oils in tanks and ancillary equipment,
- Mixed residues, and
- Containerized waste generated prior to approval of the Building 776/777 DOP (November 5, 1999)

3.0 DIRECTIONS AND INFORMATION

NOTE *In the event a tank has been misidentified as "RCRA Stable" or "Physically Empty" (i e , significant amounts of liquids or sludges are found in the tank during decommissioning), the remaining liquids or sludges will be managed as process waste*

NOTE *If you are uncertain whether your waste is a remediation waste, consult with the B776/777 Environmental Manager*

3.0 DIRECTIONS AND INFORMATION (continued)

3.1 Remediation Waste Planning

Environmental Manager, Waste Manager, or designee

[1] Work with the Closure Project Manager to develop a Remediation Waste Management Unit Location Diagram, identifying the areas that may be used to treat and/or store remediation waste

[2] Maintain this diagram

[3] Perform a walkdown of each SET to identify anticipated waste streams

[4] Prepare Appendix 1, Waste Itemization and Disposition for each SET, based on results of the walkdown

[5] Attach the completed Appendix 1 to the associated Integrated Work Control Program (IWCP) work package(s)

3.2 Remediation Waste Generation, Characterization, Packaging, and Certification

Remediation waste will be generated, characterized, packaged, and certified in compliance with applicable RFETS waste management procedures, which include treatment and disposal site waste acceptance criteria (WAC) and U S Department of Transportation (DOT) shipping requirements

The waste will be identified as "remediation waste" or "CERCLA waste" in applicable RFETS tracking systems (e g , Waste and Environmental Management System [WEMS], Waste/Residue Traveler) Currently, WEMS has a field called CERCLA waste, and the traveler has no field identified Therefore, this information has to be entered in the comments field

3.3 Remediation Waste Accumulation, Staging, and Storage

Remediation waste that is hazardous or mixed waste, PCB waste, or asbestos containing material (ACM) may be accumulated and stored in

- RCRA permitted storage units, or in
- Remediation waste storage units identified on the Remediation Waste Management Unit Location Diagram

Environmental Manager, Waste Manager, or designee

[1] Submit a request to the WEMS Coordinator, who will assign a unique identification number to the unit, to establish a remediation waste storage unit

[2] Prepare Appendix 2, Remediation Waste Storage Unit Information Sheet, indicating the unit name, number, and date established, unit-specific requirements, special restrictions and/or hazards, and emergency contact information

[3] Post the unit information sheet in the unit

[4] Maintain a list of active remediation waste storage units and note the current status of each unit on the Remediation Waste Management Unit Location Diagram

[A] The current status will include the dates on which each unit is opened and closed

[B] A current version of the active list and diagram will be posted in the Configuration Control Authority (CCA) office

Facility Personnel

[5] Affix remediation waste labels to containers of remediation waste

[6] Close remediation waste containers when <u>not</u> in use, and store to provide adequate aisle space for inspections, container movement, and personnel egress

[7] Characterize, segregate, label, and accumulate large pieces of equipment (e g , gloveboxes), lead shielding, lead bricks, printed circuit boards, and computer monitors in remediation waste storage units with no time limits or containerization requirements Store in a manner that will prevent releases to the environment

3.3 Remediation Waste Accumulation, Staging, and Storage (continued)

[8] Stage and/or store remediation waste outdoors, as necessary, in designated remediation waste storage units, in compliance with 1-M12-WO-4034, Solid Radioactive Waste Packaging Manual, which includes requirements for waste drums, cargo containers, metal boxes, and plywood boxes

3.4 Remediation Waste Treatment

Facility Personnel

[1] Perform generator treatment (e g , elementary neutralization, filtration of aqueous wastes, addition of absorbent) on remediation waste, as necessary, without prior approval from the lead regulatory agency (LRA)

[2] Perform other types of treatment (e g , mercury amalgamation, and waste solidification) in approved remediation waste treatment units

[3] Collect and characterize wastewater generated from decommissioning activities to determine the appropriate management option (e g , onsite treatment, interim storage pending offsite treatment and/or disposal)

Environmental Manager, Waste Manager, or designee

[4] Prepare a minor modification to the Building 776/777 DOP, including the following information for each treatment unit

- Type of unit,
- Length of time the unit will be in operation,
- Volume of remediation waste to be managed,
- Physical and chemical characteristics of the remediation waste to be managed,
- A unit-specific Appendix 3, Remediation Waste Treatment Unit Information sheet, indicating the unit name, number, and date established, unit-specific requirements, special restrictions and/or hazards, and emergency contact information, and
- A unit-specific Appendix 4, Periodic Observation Log, indicating the required inspection frequency

[5] Submit a request to the WEMS Coordinator, who will assign a unique identification number to the unit, upon LRA approval of each treatment unit,

[6] Post the approved Appendix 3, Remediation Waste Treatment Unit Information Sheet in the unit

3.4 Remediation Waste Treatment (continued)

[7] Maintain a list of active remediation waste treatment units and note the current status of each treatment unit on the Remediation Waste Management Unit Location Diagram The current status will include the dates on which each unit is opened and closed

[8] Post a current version of the list and diagram in the CCA office

[9] Verify that each treatment unit will be operated by trained operators in accordance with an approved procedure

3.5 Inspections and Reporting

Facility Personnel

[1] Conduct a weekly observation of each active remediation waste storage unit to identify spills, leaks, evidence of corrosion, and other obvious safety or health problems The observations will be documented on a unit-specific Appendix 5, Remediation Waste Storage Unit Quarterly Observations Building 776/777

[2] Conduct daily observations of each active remediation waste treatment unit to verify the treatment system is in good condition and free of deficiencies that could impair its effectiveness Document observations on the approved unit-specific log sheet

[3] Note deficiencies on the appropriate log sheet, and report to supervision

[4] Enter deficiencies into the Environmental Compliance Action Tracking System (ECATS) in accordance with PRO-455-ECATS, Environmental Compliance Action Tracking System

3.6 Closure of Remediation Waste Management Units

As SETs are decommissioned and remediation waste treatment and storage units are no longer necessary, each will be closed in accordance with one of the three closure performance standards identified in Section 4 of the Building 776/777 DOP (i e , clean closure, unit removal with "debris rule" treatment, or unit removal without onsite treatment), or clean closed using the following criteria CERCLA Storage/treatment units may be "Clean Closed" either by documenting the absence of contamination or

decontaminating the unit For units having a complete, detailed operating history, clean closure will be demonstreated when the following criteria are met

- An administrative review of the operating history indicates that hazardous or mixed waste was never spilled in the unit, or if a spill did occur, it was cleaned up and the spill area was decontaminated and
- A visual inspection of the unit and adssociated ancillary equipment notes an absence of hazardous or mixed waste stains and/or residuals

Environmental Manager, Waste Manager, or designee

[1] Upon successful closure of a remediation waste treatment or storage unit

[A] Direct the WEMS Coordinator to delete the unit from the WEMS database,

[B] Remove the unit information sheet from the unit, and

[C] Remove the unit from the list of active remediation waste management units and the Remediation Waste Management Unit Location Diagram

[2] Reopen a closed remediation waste management unit at any time by notifying the WEMS Coordinator, and updating the list of active units and unit location diagram

3.7 Preparedness and Prevention

Releases of remediation waste will be managed in accordance 3-V35-BERO-14 776/777, Building 776/777 Emergency Response Operations Plan, 1-D97-ADM-16 01, Occurrence Reporting Process, and the Site Emergency Plan (EPLAN-99)

Releases will be cleaned up to ensure that all visible residual liquids and solid wastes have been removed from equipment and structures to prevent a threat of release to the environment

Facility emergency communications and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment will be inspected and/or tested and maintained in accordance with RFETS requirements

3.8 Recordkeeping

Remediation waste records will be comprised of

- SET files,
- Unit information sheets,
- Remediation Waste Management Unit Location Diagram,
- Inspection logs, and
- Characterization data

Remediation waste records will be maintained as part of the B776/777 Project Record

3.9 Personnel Training

Environmental Manager, Waste Manager, or designee

[1] Brief waste management personnel on the remediation waste management requirements described in this Operations Order

[2] Conduct an initial briefing prior to implementation of this Operations Order Waste management personnel who are assigned to Building 776/777 after the initial briefing, will be briefed as part of their building indoctrination

[3] Conduct additional briefings annually (i e , as an annual refresher) and each time this Operations Order is modified

[4] As remediation waste treatment units are established in Building 776/777, provide treatment unit operators with unit-specific training

4.0 REFERENCES

Building 776/777 Closure Project Decommissioning Operations Plan (DOP)

1-M12-WO-4034, Solid Radioactive Waste Packaging

1-D97-ADM-16 01, Occurrence Reporting Process

3-V35-BERO-14 776/777, Building 776/777 Emergency Response Operations Plan

PRO-455-ECATS, Environmental Compliance Action Tracking System (ECATS)

RFETS Emergency Plan, EPLAN-99

CONCURRENCE

Jed A Hopkins 5/5/06
ENVIRONMENTAL Date

N/A
INDUSTRIAL HYGIENE & SAFETY Date

N/A
776/777 TECHNICAL SUPPORT Date

N/A
776/777 ENGINEERING Date

SEB-776-00-16-DSR-R01
5/5/06
NUCLEAR SAFETY Date

N/A
RADIOLOGICAL OPERATIONS Date

N/A
CRITICALITY SAFETY Date

N/A
PLANT REVIEW COMMITTEE Date

Work Control Number T0XXXXXX

B776/777

SAMPLE

SET _____

Room _____

WASTE ITEMIZATION AND DISPOSITION

Appendix 1
Page 1 of 1

This waste guidance is issued to provide workers with an appropriate WGI for the waste listed and additional instruction to the WGI

1	WASTE ITEM DESCRIPTION. Oil generated from the Rigaku Donkis Transformer model #TR43B in Room XXX						
RADIOLOGICAL CHARACTERIZATION METHOD	**CONTAINER TYPE**	**LINE GENERATED (YES OR NO)**	**WGI #**	**IDC #**	**IDC Description**	**RCRA Hazardous Waste Characterization**	**WASTE STREAM #**
Sealed unit – Low-level by default	Drum (55-gallon bung drum)	No	None	529	Used Oil – Non line	Unknown	D&D-3-22
PCB GUIDANCE		**ASBESTOS GUIDANCE**	**SAMPLING REQUIRED**		**OTHER WASTE GUIDANCE**		
PCB content is unknown, handle oil as though PCBs were present (include IH&S and appropriate PPE)		None	Yes – confirm no PCBs		Carefully remove oil contained in the transformer and place in the Used Oil Drum in Room XXX (in process)		

2	WASTE ITEM DESCRIPTION Hydraulic oil generated from miscellaneous equipment in pumps from all rooms						
RADIOLOGICAL CHARACTERIZATION METHOD	**CONTAINER TYPE**	**LINE GENERATED (YES OR NO)**	**WGI #**	**IDC #**	**IDC Description**	**RCRA Hazardous Waste Characterization**	**WASTE STREAM #**
Sealed unit – Low- level by default	Drum (55 gallon bung drum)	No	None	529	Used Oil – Non line	Nonhazardous	D&D-3-22
PCB GUIDANCE		**ASBESTOS GUIDANCE**	**SAMPLING REQUIRED**		**OTHER WASTE GUIDANCE**		
None		None	Yes – confirm no PCBs		Carefully remove significant quantities of oil contained in pumps, if any, and place in the Used Oil Drum in Room 182 (in process) For insignificant amounts of oil, use Kim-wipes to absorb oil and place in wet combustible drum (see wet combustible waste guidance below)		

The alphabetical letter at the end of the WGI number indicates the latest version – always use the latest version

Management Requirements for Remediation Waste
Effective Date

Appendix 2
Page 1 of 1

SAMPLE
REMEDIATION WASTE STORAGE UNIT INFORMATION SHEET

CERCLA UNIT #776-_____

Room _____

OPENED: January 3, 2000

In Case of Emergency Contact

Building 776/777 CCA
Extension 2348, Dxxx-xxxx, or DIAL 2911

Nearest Telephone is located in Room _____
Nearest Spill Cabinet is located in Room _____
Nearest Fire Extinguisher is located at each door

Unit Specific Requirements:
- *Liquid waste containers will be stored in catch pans*

Unit Specific Exceptions:
- *None*

Special Restrictions/Hazards:
NO SMOKING

Area Status: **ACTIVE**

Appendix 5
Page 1 of 1

SAMPLE

REMEDIATION WASTE STORAGE UNIT
WEEKLY OBSERVATIONS
BUILDING 776/777

Unit Number:									
Unit Location:									

Date.				
Time.				
ANSWER "YES" OR "NO"				
Spills?				
Leaks?				
Do any containers being stored pose a threat of release due to the condition of the container?				

Always notify the duty CCA and your supervisor of any problems. All "YES" answers require an explanation and description of corrective action(s) taken (including date and time).

EXPLANATION/CORRECTIVE ACTION(S)

_____

_____

_____

Printed Name:				
Signature:				
Employee Number:				